

1 The Honorable John C. Coughenour  
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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 SUMIT GARG,

13 Defendant.

14 NO. CR21-0045 JCC

15 UNITED STATES' RESPONSE  
16 TO DEFENDANT'S MOTION  
17 CHALLENGING CONDITIONS  
18 OF CONFINEMENT IN  
19 VIOLATION OF DUE PROCESS

20 (Docket No. 257)

21 Comes now the United States of America, by Nicholas W. Brown, United States  
22 Attorney for the Western District of Washington, Andrew C. Friedman, Assistant United  
23 States Attorney for said District, and Anthony Teelucksingh, Senior Trial Attorney,  
24 Computer Crime & Intellectual Property Section, and files this Government's Response  
25 to Defendants' Motion Challenging Conditions of Confinement in Violation of Due  
26 Process.

27 Defendant, Sumit Garg, has filed a motion challenging his access to legal  
resources at the Federal Detention Center - SeaTac. Pursuant to a prior Order of this  
Court, *see* Order (Docket No. 207), Garg is required to show, and the Court to find, good  
cause for the filing of this motion before the government is required to answer the  
motion. Having reviewed Garg's motion, the government does not object to the Court

1 finding good cause for the motion, and therefore does not object to the Court ordering the  
2 government to file a response on the merits of the motion.

3 The government already has inquired of the Bureau of Prisons concerning the  
4 issues raised in Garg's motion, has received responses to some of its inquiries, and  
5 expects to receive responses to the remaining inquiries shortly. As a result, assuming the  
6 Court finds good cause for the timing of Garg's filing, and orders the government to  
7 respond, the government can do so within a week of such order.

8 DATED: January 19, 2023.

9 Respectfully submitted,

10 NICHOLAS W. BROWN  
11 United States Attorney

12 */s/ Andrew C. Friedman*

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13 ANDREW C. FRIEDMAN  
14 Assistant United States Attorney

15 */s/ Anthony Teelucksingh*

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16 ANTHONY TEELUCKSINGH  
17 Senior Trial Attorney  
18 Computer Crime and Intellectual  
19 Property Section  
20 United States Department of Justice

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 19, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I also mailed by United States Postal Service first class mail, the foregoing to the following non-CM/ECF participant:

Sumit Garg, Register No. 33491-509  
FDC SeaTac  
Federal Detention Center  
P.O. Box 13900  
Seattle, Washington 98198

/s/ Andrew C. Friedman  
ANDREW C. FRIEDMAN

700 Stewart Street, Suite 5220  
Seattle, Washington 98101-1271  
Telephone: (206) 553-7970  
Fax: (206) 553-0882  
E-mail: [Andrew.Friedman@usdoj.gov](mailto:Andrew.Friedman@usdoj.gov)